

Wong.Mark

From: Hum.Simon
Sent: June 6, 2018 10:09 AM
To: [REDACTED]
Cc: Jacobs.Oscar; Seguin.Nicole; Trottier.Sarah
Subject: RE: PIA for GCMS data pulls

Follow Up Flag: Follow up
Flag Status: Flagged

Hi [REDACTED] - sorry I meant to provide you my opinion in writing immediately after that meeting but got pulled away, then it fell off my radar. Thanks for the prompt and my apologies for the tardiness on my follow up. As per our discussion in April with regard to this tool, ATIP does not have any privacy concerns and as such, a PIA is not required for this activity.

Best Regards,

Simon Hum

NHQ - Corporate Affairs | AC - Affaires corporatives

Immigration, Refugees and Citizenship Canada | Immigration, Réfugiés et Citoyenneté Canada

360 Laurier Avenue West Ottawa ON K1A 1L1 | 360 avenue Laurier Ouest Ottawa ON K1A 1L1

Office | Bureau NAR A1012

Simon.Hum@cic.gc.ca

Telephone | Téléphone 613-437-5910

Government of Canada | Gouvernement du Canada

From: [REDACTED]
Sent: June 6, 2018 8:39 AM
To: Hum.Simon
Cc: Jacobs.Oscar ; Seguin.Nicole ; Trottier.Sarah
Subject: RE: PIA for GCMS data pulls

Hi Symon,

From our meeting in late April, you advised that we would not need a PIA for our Chinook tool.

However, I still do not have your answer in writing. Can you please respond to this message so we can keep a copy for our records?

Thanks

From: [REDACTED]
Sent: April 26, 2018 3:19 PM
To: Hum.Simon <Simon.Hum@cic.gc.ca>
Cc: Jacobs.Oscar <Oscar.Jacobs@cic.gc.ca>; Seguin.Nicole <Nicole.Seguin@cic.gc.ca>; Trottier.Sarah <Sarah.Trottier@cic.gc.ca>
Subject: PIA for GCMS data pulls

Hi Symon,

Nice to meet you yesterday.

Below is a summary for you to give your official answer regarding our meeting to inquire whether ATIP thought we needed a PIA for the data extraction we are doing to populate our processing tool.

Any questions or additional clarifications, just let me know.

- The data requested from [REDACTED]
- The tool, and the data in the tool, will be used across IN, CN, and DN to assist officers in making decisions on Temporary Resident cases.
- Using the tool has proven quicker than reviewing eDocs in GCMS.

- The data will be exported [redacted] and populated in the tool.
- The data is not directly related to decision-making and this information is available today through existing processes in the system using [redacted]
- We are not asking for anything that is not already currently being used in the field. s.16(2)(c)
- What is being built is a more coherent report only. s.17

Thanks,

s.21(1)(a)

s.21(1)(b)

From: Hum.Simon

Sent: April 24, 2018 3:10 PM

To:

Subject: RE: PIA process?

Do you have any background material that you can share in advance of the meeting?

Symon Hum

Senior Privacy Advisor, Corporate Affairs

Immigration, Refugees and Citizenship Canada / Government of Canada

Simon.Hum@cic.gc.ca / Tel: 613-437-5910

L'Unité de la protection des renseignements personnels, des politiques et de la gouvernance, Affaires corporatives

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From: (

Sent: April 24, 2018 3:05 PM

To: Hum.Simon <Simon.Hum@cic.gc.ca>

Subject: RE: PIA process?

Yep, that's it.

From: Hum.Simon

Sent: April 24, 2018 2:56 PM

To:

Subject: RE: PIA process?

I accepted a meeting regarding something about the Chinook tool – is that the one?

Symon Hum

Senior Privacy Advisor, Corporate Affairs

Immigration, Refugees and Citizenship Canada / Government of Canada

Simon.Hum@cic.gc.ca / Tel: 613-437-5910

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Simon.Hum@cic.gc.ca / Tél.: 613-437-5910

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From:

Sent: April 24, 2018 2:39 PM

To: Hum.Simon <Simon.Hum@cic.gc.ca>

Subject: RE: PIA process?

Hi Simon, you should have received an invite for tomorrow afternoon to discuss along with SIMB.

To note that the data taken from [redacted] to assist officers in making decisions on files quicker than reviewing eDocs in GCMS. The data is not related to decision-making directly and this information is available today through existing processes in the system. What is being built is a more coherent report.

Thanks

s.17

From: Hum.Simon

s.21(1)(a)

Sent: April 23, 2018 10:09 AM

s.21(1)(b)

To: [redacted]

Subject: FW: PIA process?

Good Morning [redacted] - perhaps we can meet to discuss this project, as I will need more details in order to advise you accordingly. Feel free to send me a meeting invite at your convenience.

Symon Hum

Senior Privacy Advisor, Corporate Affairs

Immigration, Refugees and Citizenship Canada / Government of Canada

Simon.Hum@cic.gc.ca / Tel: 613-437-5910

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Simon.Hum@cic.gc.ca / Tél.: 613-437-5910

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From: Pitter.Tiffany

Sent: April 23, 2018 8:55 AM

To: Hum.Simon <Simon.Hum@cic.gc.ca>; Dunn.Amy <Amy.Dunn@cic.gc.ca>; Parent.Stefany <Stefany.Parent@cic.gc.ca>; Norwick.Adam <Adam.Norwick@cic.gc.ca>; McColl.Donald <Donald.McColl@cic.gc.ca>

Cc: Dunn.Michelle <Michelle.Dunn@cic.gc.ca>

Subject: FW: PIA process?

Good morning,

Please find below a question from IN in respect to the PIA process.

Thanks,

Tiffany Pitter

Privacy, Policy and Governance Unit

Access to Information and Privacy Division

NHQ - Corporate Affairs

Immigration, Refugees and Citizenship Canada

360 Laurier Avenue West Ottawa ON K1A 1L1

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Division de l'accès à l'information et protection des renseignements personnels

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tiffany.pitter@cic.gc.ca

Téléphone: 613-437-5611

Gouvernement du Canada

From: Bright.Lindsay

Sent: April 22, 2018 8:34 PM

To: Dunn.Michelle <Michelle.Dunn@cic.gc.ca>

Cc: Pitter.Tiffany <Tiffany.Pitter@cic.gc.ca>

Subject: FW: PIA process?

Good evening PPG,

Over to you

Thanks,

Lindsay

From:

Sent: April 20, 2018 10:18 AM

To: ATIP / AIPRP (IRCC) <IRCC.ATIP-AIPRP.IRCC@cic.gc.ca>

Cc: Gallant.Stephanie <Stephanie.Gallant@cic.gc.ca>; Jacobs.Oscar <Oscar.Jacobs@cic.gc.ca>

Subject: PIA process?

Hi ATIP team,

IN is currently working on a processing tool that involves some !

I understand that OPP's Advanced Analytics team also did a PIA recently and they advised me the first step was to go through ATIP.

Do you know of the process to follow for a PIA?

Thanks,

Senior Analyst | Analyste principal

Strategic Planning and Delivery | Planification stratégique et exécution

International Network | Réseau international

Immigration, Refugees and Citizenship Canada | Immigration, Réfugiés et Citoyenneté Canada

Government of Canada | Gouvernement du Canada

s.16(2)(c)

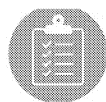
s.17

s.21(1)(a)

s.21(1)(b)



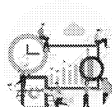
Chinook Privacy Risk Analysis Action Plan



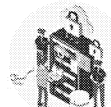
Accountability



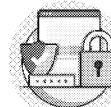
Identifying Purpose



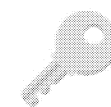
Limiting Collection



Limiting Use, Disclosure, and Retention



Safeguarding



Individual Access

Risk Description

Recommendation

Mitigation

1
Accountability

There is a [redacted] in Module 3's I Section is inaccurate, ineffective and unnecessary in the processing of TR applications.

Risk assessment:
Possible/Medium

Recommended that IRCC validate the necessity and effectiveness of the [redacted] such that it supports the continued presentation of the [redacted] in Module 3.

We are removing the [redacted] that include the [redacted] from Module 3.

Change scheduled for release in July 2020.

2
Accountability

There is a risk that Chinook is not a temporary tool and that it will be a long-term solution to assist in the processing of TR applications. Moreover, it could be expanded to process other IRCC applications.

Risk assessment:
Possible/Low

It is recommended that IRCC consider this risk and ensure contingency plans are in place to ensure proper privacy protections are in place if Chinook becomes a long-term solution or is expanded to other application types.

Chinook 2.0 is a funded IRCC project with Projects Branch leading . Privacy protections and IT Security will be up to IRCC standards for the enterprise solution. We are not expanding Chinook 1.0 to other applications types.

3
Accountability

There is a risk that Chinook continues to operate without a formal governance structure which could negatively impact necessary privacy protections.

Risk assessment:
Possible/Medium

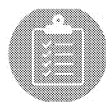
Recommended that IRCC develop a formal governance structure to support the development, management, and necessary privacy protections related to Chinook in five areas: general approval authority, [redacted] procedures, training, and awareness

There is a draft governance structure in place for Chinook 1.0

IN is working with IRM on governance for the Module 5 [redacted] Latest meeting June 29, 2020.



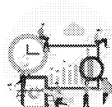
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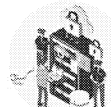
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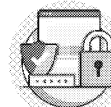
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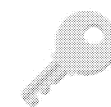
Limiting Collection



Limiting Use, Disclosure, and Retention



Safeguarding



Individual Access

Risk Description

Recommendation

Mitigation

4
Accountability

There is a risk that Chinook's use of Module 5 and the [redacted] of Module 3 is inconsistent with TBS's *Directive on Automated Decision Making*.

Risk assessment:
Unlikely/Medium

It is recommended that IRCC determine if the use of Module 3 and Module 5 [redacted] utilize analytics in a manner wherein the TBS *Directive on Automated Decision Making* applies.

[redacted] in module 3 is being removed from Chinook.

IN and CN have reviewed the TBS directive on Automated Decision Making and agree that it does not apply.

5
Identifying Purpose

There is a risk that [redacted] are being processed in absence of proper notice to the applicant that prior [redacted] is used for [redacted] and [redacted] purposes and that such [redacted] the processing of the individual's application.

Risk assessment:
Possible/Low

Recommended that IRCC modify the Privacy Notice Statement (PNS) on Form IMM 1295 (paper and e-application) such that it contains the same paragraph which is found in the PNS on the TRV and SP application forms.

GCMS Change Request #514354 approved and awaiting for implementation.

It was submitted September 26, 2019 and is pending TDSS implementation.

6
Limiting Collection

There is a risk that access to the GC Docs folder where IT Operations staff upload daily Enterprise Data Warehouse (EDW) extracts allows more access than is necessary/justified.

Risk assessment:
Unlikely/Medium

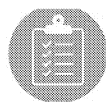
Recommended that IRCC restrict access to the EDW extracts to the least number of staff as possible. Furthermore, it is recommended that once EDW data is extracted and stored in the folder for consumption by IN offices, the data files cannot be modified.

Since January 2020, Chinook [redacted] were moved to a [redacted].

The [redacted] access is granted by EDW after receiving a list of names from IN Chinook team. The list of access names will be reviewed bi-annually.



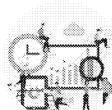
Chinook Privacy Risk Analysis Action Plan



Accountability



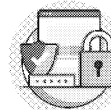
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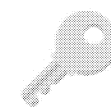
Limiting Collection



Limiting Use, Disclosure, and Retention



Safeguarding



Individual Access

Risk Description

Recommendation

Mitigation

7
Limiting Use, Disclosure, and Retention

There is a risk that Chinook is a System of Record (SOR) and the daily purging of data files is inconsistent with the retention practices of TR application data.

Risk assessment:
Unlikely/Medium

Recommended that IRCC consult with the Department's Information Management (IM) SMEs to determine if Chinook is transitory information or if it is a SOR.

IN met with Info Management on June 22, 2020. Their email of June 26 indicated the consensus at that time was that the Mod 3 worksheets are transitory.

8
Limiting Use, Disclosure, and Retention

There is a risk that Chinook Experts, who are responsible for purging EDW extracts on a daily basis, are not doing so.

Risk assessment:
Unlikely/Medium

Notwithstanding the outcome of Risk #7, it is recommended that IN's awareness material remind Chinook Experts that their should contain only one version of each EDW data extract.

A message to replace the EDW extracts each day has been shared with Area Experts. This will be included in User Manuals as well.

9
Limiting Use, Disclosure, and Retention

There is a risk that there are multiple copies of Chinook being stored by Officers/Managers in email accounts and local drives.

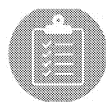
Risk assessment:
Likely/Low

It is recommended that Chinook procedures and awareness are issued to staff regarding the creation, retention, and destruction of Chinook versions.

A message to delete Excel spreadsheets has been shared with Area Experts on monthly teleconferences. This will also be included in the Module 3+4 User Manual currently in development by CN. Mod 3 disclaimer now reminds officers to delete spreadsheets on a daily basis



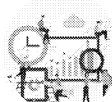
Chinook Privacy Risk Analysis Action Plan



Accountability



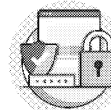
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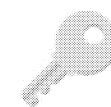
Limiting Collection



Limiting Use, Disclosure, and Retention



Safeguarding



Individual Access

Risk Description

Recommendation

Mitigation

10 Safeguarding

There is a risk that Module 5 in accordance with Protected/Classified information requirements of IRCC and the Government of Canada.

Risk assessment:
Unlikely/High

It is recommended that IN interface with the IRCC DSO and determine the appropriate information security designation for the Module 5 determined to be Secret, IRCC would have to [redacted] of the Module 5

IN has received guidance from Admissibility Branch and IPG Branch on the classification of information received from [redacted]. The classification is the responsibility of the receiving RAO. IN has instructed RAOs that information submitted to Chinook must have a maximum designation of Protected B.

11 Individual Access

There is a risk that Chinook information will not be released to an individual or requester due to the Module 3 disclaimer, which has not been reviewed/approved by IRCC ATIP.

Risk assessment:
Unlikely/Medium

Recommended the following portion of the Module 3 disclaimer is reviewed and approved by ATIP:

We are removing the [redacted] from Module 3 therefore, the disclaimer is not required. We are replacing it with info to reinforce [redacted] etc. Due July 2020.

Note that there were no risks identified with the following principles: Consent, Openness, and Compliance.

No risks were identified regarding Accuracy that have not already been identified in another risk; for example, see Risk #1.

For more detail, please see: <http://gcdocs2.ci.gc.ca/otcs/cs.exe?func=ll&objaction=overview&objid=342026475>

IMPACT / INCIDENCE	High Élevée			
	Medium Modérée			
	Low Faible			
		Unlikely Improbable	Possible	Likely Probable

PROBABILITY x IMPACT = RISK LEVEL PROBABILITE x INCIDENCE = NIVEAU DE RISQUE	
High Élevé	H = High risk: May require Minister or Deputy Minister involvement É = Risque élevé : Peut exiger l'intervention du ministre ou du Sous-Ministre
Medium Modéré	M = Medium risk: May require involvement at Assistant Deputy Minister (ADM) level M = Risque modéré : Peut exiger l'intervention au niveau de Sous-Ministre Adjoint (SMA)
Low Faible	L = Low risk: Managed by routine procedures, or may require involvement of Director General (DG) F = Risque faible : Risque géré dans le cadre des procédures usuelles, ou peut exiger l'intervention du Directeur/Directrice Générale (DG)



Privacy Risk Assessment (PRA)

Chinook

Version 3.0; August 22, 2019

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Document Control Table

Version Number	Date	Description of Changes	Author
1.0	17-July-2019	Initial Draft	
2.0	02-Aug-2019	Edits from IN Review of Version 1.0	
3.0	22-Aug-2019	Edits from IN Review of Version 2.0	

ACRONYMS

Acronym	Full Title
AA	Advanced Analytics
ADM	Assistant Deputy Minister
ATIA	<i>Access to Information Act</i>
ATIP	Access to Information and Privacy
CBS	Canadian Based Staff
CBSA	Canada Border Services Agency
CN	Centralized Network
COB	Country of Birth
CoR	Country of Residence
CPC	Case Processing Centre
CPC-O	Case Processing Centre - Ottawa
DLI	Designated Learning Institution
DN	Domestic Network
DOB	Date of Birth
DOJ	Department of Justice
DSO	Departmental Security Officer
EDW	Enterprise Data Warehouse
ESDC	Employment and Social Development Canada
GAC	Global Affairs Canada
GC	Government of Canada
GCMS	Global Case Management System
IM	Information Management
IN	International Network
IPG	Immigration Program Guidance
IRCC	Immigration, Refugees and Citizenship Canada
IRM	Integrity Risk Management
IRPA	<i>Immigration and Refugee Protection Act</i>
ISA	Information Sharing Agreement
IT	Information Technology
LES	Locally Engaged Staff
LOA	Letter of Acceptance
MOU	Memorandum of Understanding
NHQ	National Headquarters
NOC	National Occupational Classification

Acronym	Full Title
OPC	Office of the Privacy Commissioner
OSC	Operations Support Centre
PA	Primary Applicant
PDI	Program Delivery Instruction
PIA	Privacy Impact Assessment
PIB	Personal Information Bank
PNS	Privacy Notice Statement
POB	Place of Birth
PRA	Privacy Risk Assessment
RAO	Risk Assessment Officer
RAOC	Risk Assessment Officer Coordinator
SIMB	Solutions and information Management Branch
SME	Subject Matter Expert
SOP	Standard Operating Procedure
SOR	System of Record
SP	Study Permit
SPC	Special Program Code
TBS	Treasury Board Secretariat
TDSS	Transformation and Digital Solutions Sector
TR	Temporary Resident
TRV	Temporary Resident Visa
UCI	Unique Client Identifier
VAC	Visa Application Centre
WP	Work Permit

1. OVERVIEW

This Privacy Risk Assessment (PRA) has been developed to assess the privacy risks associated with the use of Chinook; a tool assisting IRCC staff in the processing of temporary residence (TR)¹ visa applications and actioning decisions in the Global Case Management System (GCMS).

Section 6.3.1 of Treasury Board Secretariat's (TBS's) *Directive on Privacy Impact Assessment*, in part, requires a Privacy Impact Assessment (PIA) to be authored and submitted to the Office of the Privacy Commissioner (OPC) when a program or activity involving personal information undergoes '*substantial modification*.' In consultation with IRCC's Access to Information and Privacy (ATIP) Division, IRCC has determined that the use of Chinook to support the processing of TR applications is not a *substantial modification* to the existing TR application processing and, therefore, a PIA is not required. However, IRCC desires a PRA on Chinook and staff's use of the tool to ensure appropriate safeguards are in place.

This document is not a PIA nor is it intended to be submitted for review and recommendation to the Office of the Privacy Commissioner (OPC). It is intended for internal consideration only and written in accordance with the scope section of this report; see Section 1.4.

1.1 Description and Development of Chinook

Over the last approximately five (5) years, IRCC has been experiencing significant increases in the volume of TR applications. In parallel, overseas offices have been experience processing and connectivity issues with GCMS. First, for some offices, the Canadian mission's connection to GCMS (via Citrix) is slow or unavailable, or GCMS is otherwise not responding quickly. Second, updates to GCMS are performed by National Headquarters (NHQ) during business hours of some overseas offices. While not a daily occurrence, when GCMS maintenance is performed it removes an office's ability to process any applications for several hours. Regardless of what time NHQ decides to perform maintenance, multiple overseas offices are impacted. Third, the manner in which data is searched for and presented to users in GCMS can be time consuming – the data required for consideration in approving or refusing a TR application is not always presented in GCMS in an efficient and effective manner.

Considering the pressure IRCC has in processing TR applications, some overseas offices have developed workarounds for these issues. For example, Smartbook was a MS Excel solution developed in collaboration between offices in Abu Dhabi, Ankara, and London. Hiraya, a similar tool, was developed by the IRCC office in Manilla. Both tools utilized (b) (6) to populate MS Excel spreadsheets to assist officers in considering details of an application and reaching a decision. Once decisions were (b) (6) to enable offices to close off/action applications more efficiently. It typically entailed a manual process of (b) (6)

¹ For the purposes of this PRA, a TR application is considered an application to visit Canada, as well as permits to study or work.

Smartbook and Hiraya represent the most sophisticated tools developed by overseas offices to assist in processing TR applications. Smartbook was used in London, Ankara, Abu Dhabi, and several other offices for approximately one-year spanning 2017 and 2018. Hiraya was used in Manila and several surrounding offices in Southeast Asia for less than 12 months in 2017.

but it has not been verified from all users of Smartbook and Hiraya.

Other offices are known to have used far less advanced solutions which followed the same model – assess applications outside of GCMS faster and subsequently access GCMS to record the TR decision.

With multiple, and sometimes similar, processing tools being developed across the networks, subject matter experts (SMEs) from the International Network (IN), Centralized Network (CN), and Domestic Network (DN) met in January 2018 and again in May 2018 to plan/design a global processing tool that could be used across all networks for TR applications. The aim of the meetings was to consolidate and hone existing concepts and to create a universal tool that uses GCMS data and presents it in a way that allows the user to select multiple cases outside GCMS for bulk processing while realizing considerable processing efficiency gain. Buy-in for the project was secured from Solutions and Information Management Branch (SIMB), Operations Planning and Performance (OPP), and Immigration Program Guidance (IPG). In preparation for the January 2018 SME meeting in London, the following 'Guiding Principles' were developed to ensure bias was not the driver for tool choice, thereby ensuring the best solution was selected.

1. Provide ease of use for users, including an intuitive interface;
2. Rely on repairable technology (i.e.: low tech so that no specialized technical knowledge is required if repairs and adjustments are needed);
3. Applicable to e-applications and paper applications;
- 4.
5. Can be universally applied (for use by IN, CN, an DN);
6. Incorporate factors in a statistically significant way;
7. Are scalable for use in large or small offices with a range of diverse or homogenous caseloads;
8. Compatible with other external data/toolsets (i.e. I2); and
9. Increase the quantity and quality of TR decision-making across the networks in a consistent manner.

Ultimately, the result of these meetings was the development of a tool called Chinook. While different, it is most aligned with Development of Chinook was organized into modules with each module adding a different layer of functionality to the tool. Initially, the modules were prioritized and modules 1 (File Management), 3 (Decision-Maker) and 4 (Post Decision) were planned and developed in 2018. The coding, testing and deployment of the remaining modules have either been completed or are planned for deployment in fiscal year (FY) 2019-20. Section 2.4 of this PRA provides a more detailed description of the deployment schedule and users for all modules.

1.2 Project Peacock

In December 2018, Project Peacock mandated the use of Chinook at the Delhi Office by a team of 20 experienced Visa Officers. The intent of the project was to process all pending VAC TR applications in the Delhi inventory. Over the course of four weeks, Chinook was used in the following manner:

- Decisions-makers reviewed application details in Module 3 and used Module 4 to generate refusal notes and refusal grounds.
- Decision makers recorded final decisions in GCMS but did not enter notes, grounds for refusal, or generate letters in GCMS.
- The Chinook Action Lists from Module 4 (for refusals) were compiled into a master spreadsheet and sent to CN/Operations Support Centre (OSC) on daily basis.
- In GCMS, CN/OSC copies and pastes the refusal notes, generated refusal grounds, and generated the refusal letters in the appropriate print queue

By having CN perform the GCMS activities, the Peacock team of officers were able to process 17% more decisions during their temporary duty assignment. Over the course of the four weeks, the team of 20 officers, with OSC's support, completed approximately 42,000 TR applications.

1.3 Future of Chinook

The current plan for Chinook is to finalize the development and deployment of all Chinook modules to all regions of IN and CN. In parallel to Chinook deployment, IT Operations (a branch within Transformation and Digital Solutions Sector – TDSS) is tasked with developing GCMS functionality which provides the features of Chinook or building the Chinook functionality in an IT Operations maintained and supported tool with an ultimate goal of decommissioning Chinook within five years.

1.4 Scope of this PRA

The scope of this PRA is to assess the privacy risks associated with Chinook (modules 1 to 6), as well as the uses of the tool. As such, this PRA scope includes a description and analysis of the following:

1. Data stored in Chinook, including the origin of that data
2. GCMS data extracts performed by EDW staff to support the use of Chinook by IRCC regions
3. Identification of any new data in Chinook
 - a. Specific focus on Module 3's section
 - b. Specific focus on Module 5 and the presentation of Module 5 in Module 3
4. User roles/access to Chinook
5. Safeguarding, retention and disposal of Chinook data extracts and decisions recorded in Chinook

Conversely, the following is out of scope for this PRA:

1. A detailed description and analysis of the TR application process.
2. Safeguards, user roles, and accessibility of information in GCMS and the EDW

3. Integrity/Investigative activities of IRCC regarding TR applications, including any immigration enforcement activities.
4. Chinook Toolbox: this module provides users with tools which does not utilize any of the EDW data extracts from GCMS. It provides links to the *Immigration and Refugee Protection Act (IRPA)*, the *Criminal Code of Canada*, currency converter, and other similar tools. No personal information is stored/used in the Toolbox, therefore, no privacy analysis is required.

2. CHINOOK ADMINISTRATION

This section provides an overview of various administrative functions related to Chinook, including governance, user roles, training, and GCMS data extracts.

2.1 Roles and Responsibilities

The following groups/divisions within IRCC have responsibilities in the development, maintenance, and use of Chinook.

1. IN: SMEs on the processing of TR applications in GCMS. Every office in the IN maintains a Chinook Expert, who are the SMEs on Chinook for that office/region. The Chinook Experts, or their designees, are responsible for downloading EDW data extracts daily, provide training and leadership on the use of Chinook, and act as a liaison to IN NHQ regarding Chinook.

IN at NHQ also maintains several key resources in the maintenance and training of Chinook. Furthermore, the Risk Assessment Officer Coordinator (RAOC), who approves all Module 5 [redacted] and Module 5's [redacted] is part of IN NHQ.

2. CN: is responsible for the IT development of Chinook.
3. DN: the DN is less involved in the use of Chinook, as well as the development of the tool. DN does not process TR applications so, at this time, there is one DN Chinook Expert who is the DN liaison to the Chinook project; however, there are no DN Chinook users.
4. Transformation and Digital Solutions Sector (TDSS)/Information Technology (IT) Operations: IT Operations maintains a dedicated team to the department's Enterprise Data Warehouse (EDW). Daily, one person is responsible for extracting the data files necessary for Chinook to be used across the globe. Also, TDSS is responsible for integration of Chinook into GCMS.
5. Integrity Risk Management (IRM): provides IN with assistance on the development of a Module 5 governance structure.

2.2 Governance

In the formulation of Chinook, there was no formal governance structure regarding approvals and decisions. As reflected throughout this PRA, some decisions and parts of Chinook were approved informally. Additionally, certain aspects of Chinook are migrating to a more established governance framework with robust procedures to reflect approvals and activities.

2.3 Chinook Training

IRCC has established a list of Chinook Experts within the NHQ area of Ottawa as well as throughout the IN. Those persons who have been identified as Chinook Experts are expected to receive training on

those modules which have not been released and pass on that training to staff within their office. Moreover, they are the first point of contact within their region related to reports and troubleshooting of any Chinook-related issues.

When an office deploys Chinook and new modules of the tool, the following training sessions are delivered by Chinook Experts in NHQ or in the local office by Chinook Experts:

1. Familiarization
2. Engagement
3. Functional training
4. Distribution of SOPs and User Guides
5. Virtual implementation
6. Pre-launch set up and adjustments
7. Go Live

Additionally, there is support after Go-Live as well as troubleshooting and resolution provided by NHQ.

To date, there have been approximately 15 Chinook training sessions provided by Chinook experts in various offices within the IN.

2.4 Current Users (July 2019)

The following provides a summary of Chinook users; currently as well as planned.

Table 1: Chinook Users	
Module Number and Name	Description of Users and Plan
Module 1: File Management	Approximately 1/3 of 53 TR processing offices (including CPC-O) use this module.
Module 2: Pre-Assessment	No users as of July 2019; deployment schedule is to go live with this module in the Fall 2019
Module 3: Decision-Maker and Module 4: Post Decision	Except the U.S. Network, all 53 TR processing offices and the CPC-O use these two modules. Note these two modules are used in conjunction with each other. Module 3 brings the application data, and Module 5 into one MS Excel spreadsheet, while Module 4 supports the decision and recording of those decisions in GCMS.
Module 5:	Available for all offices (including the U.S. Network) to request to be populated into Module 3.
Toolbox <i>Out of Scope for this PRA</i>	No data extract from the EDW; just a group of useful tools like IRPA language, and currency converter, as well as others. All users have access to this module.

The U.S. Network does not use Chinook due to their caseload which require more officer involvement and analysis, including a higher percentage of specialization TR applications including diplomatic and official visits, rehabilitation applications, permanent resident determinations, temporary resident permits and authorities to return to Canada. However, as stated in the above table, they can create Module 5 indicators which can be used within Chinook by all offices.

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IRCC would like to see each office use all modules but the decision to use all modules is a decision left at the discretion of each office. The current timelines for deployment across the IN varies from one office to another.

2.5 Chinook Data Files/Data Extracts by EDW Staff

Daily (including weekends), data extracts are obtained from the Enterprise Data Warehouse (EDW) which contains a copy of GCMS. The extract queries are performed at approximately 9:00 a.m. EST but may be later based on the updates from transactional databases to the EDW. An assigned staff person performs multiple queries of the EDW and saves those files to a dedicated area of GC Docs; specifically, the *TR > Report > Chinook* folder.

The extracts performed are:

1. **Extract for Module 1 (daily):** an extract of all open TR applications with the data/fields listed in Table 2 below.
2. **Extract for Module 3 (daily):** an extract of open TR applications with the data/fields listed in Table 3 below.
3. **Extract for Module 3 (daily):** an extract for the section of Module 3 with the data/fields listed in Table 4 below. This data is used to assess up to on open applications with past applications with the same . While this data is extracted daily and made available to staff in the above referenced GC Docs folder, Chinook experts do not update the data files daily; most, if not all offices, update their data files monthly.
4. **Extract for Module 4 (daily):** an extract of refusal letters not sent to the applicant. As of July 2019, this daily extract is queried from the EDW and stored in the above referenced GC Docs folder; however, use of this data set is current under User Acceptance Testing (UAT) in the Ankara office. Outside of Ankara, no one is currently using this EDW extract. Plans are for the extract to be used sometime in Fall/Winter 2019 (dependent on development resources).
- 5.

The data extracted for Module 6 is listed in Table 5.

All queries are performed and then structured via region such that each region obtains, for example, Module 1 data specific to their region.

When a new extract is stored in the *TR > Reports > Chinook* folder, the EDW staff person writes over the previous day's file. However, GCDocs maintains a version history of all files; therefore, on a monthly basis, the EDW staff person purges all prior versions except for the prior seven days. At any given time, the GC Docs folder may have the existing version of the above five extracts and the prior 7-30 calendar days of data extracts.

All regions are aware of the timelines for these data pulls and each office functions on data that is at least 24 hours old.

The following tables provides a high-level description of the five EDW data extracts.

Table 2: Module 1 Data Extracts from EDW/GCMS		
Received Date	Age	
Application Number		
Language		
Primary Office		
Assigned To		
Category		
Subcategory		
Counterfoil Category	Biometric Information	Requested Item
Channel		Outgoing Correspondence
Fees Status	Active Group	Document Issuance
Application Status		Event
Citizenship		
Citizenship Country Code		
Country of Residence (CoR)	IME Status	
CoR Country Code	Medical Activity Update Date	

Table 3: Module 3 Data Extracts from EDW/GCMS	
Data Element/Field	Description/List of Values (LOV)
Client UCI	The extracts from the EDW filters for primary applicant (PA) Client UCIs on all open TR files (TRV, SP, WP), where the Final Decision is NULL
Application Received Date	Date application was received
Primary Office	IRCC office location
Application Number	GCMS assigned unique application number
Application Channel	e-Application, Paper
Application Category	TRV, SP, WP
Application Subcategory	Varies but a sub-category of TRV, SP, and WP
Application Counterfoil Category	
Application Special Program	
Group Number	GCMS assigned unique group number
Group Type and Group Name	Type of group and name given to the group
Application Assigned To	GCMS user ID assigned to process the application

Eligibility	Outcome of eligibility assessment; Passed, Failed, Review Required, Recommend Passed
	Status of the applicant having biometrics collected; e.g. 'Complete'
Client Information	Name Citizenship CoR Gender Marital Status Age DOB Country of Birth (COB) Client Place of Birth (POB) Email Address (on application)
Client CoR Status	The applicant's status in their CoR; e.g. citizen
Spouse Information	Name Marital Status Marital Start Date
Designated Learning Institution	Name of school (for SPs)
Application Purpose of Visit	Purpose of visit; tourism, visit family, etc.
Visit Start and End Dates	Start and End Dates
Pre-Assessment Note	
Study Permit Data	Level of Study Field of Study Tuition Expenses Paid
Work Permit Data	WP Exemption Code Labour Market Impact Assessment (LMIA)/LMIA Exempt # NOC (See Note 1) NOC Description Salary Intended Occupation Employer
Travel Document Information	Travel Document Type TD Document Number TD Expiry Date TD Issuing Country

Past Application Details	
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Note 1: National Occupational Classification provides a standardized language for describing the work performed by Canadians in the labour market.

Table 4: Module 3

Table 5: Module 6

2.6 Chinook User Roles

Once an IRCC office is granted access, all immigration personnel have access to Chinook. The only restrictions are as follows:

- Chinook Expert/Administrator: For Modules 1 and 2, an Administrator role is assigned to the Chinook Expert (a Chinook SME in each office). That Administrator can add other staff to the position of Administrator, which allows the user to set permissions and rules in Module 1 and amend their office template in Module 2.
- Risk Assessment Officer Coordinator (RAOC): In Module 5, only the RAOC has access to create Module 5. As of July 2019, only one person has been designated as the RAOC user for Module 5.
-

2.7 Access to Chinook Data Files/Permissions in GC Docs

Chinook data files are maintained by IRCC in two folders. This section details the information stored in these two folders and the assigned permissions as of July 2019. First, the Chinook tool itself is stored in a GC Docs Folder via the following path:

Chinook Cross Network TR Processing Suite > Chinook

Second, the data files extracted by the EDW staff, which are stored in *the TR > Reports > Chinook* folder are access by Chinook Experts via the following path with the *Chinook Data* folder being a shortcut to the *TR > Reports > Chinook* folder (where EDW stores the EDW extracts).

Chinook Cross Network TR Processing Suite > Chinook Data

From the *Chinook Data* folder, each office copies and pastes the files needed (based on which modules they are using) and stores them into a specific shared drive; for nearly all offices, that is the *Chinook Experts* are instructed to delete the previous day's data sets such that no office maintains days, weeks, or months of EDW data extracts. Furthermore, the Module 3 *Chinook Data* file is available for download daily, but is only replaced on a monthly basis by Chinook Experts.

The table below describes the permissions for the main folder: *Chinook Cross Network TR Processing Suite*.

Table 6: Data Stored in Chinook GC Docs Folder (<i>Chinook Cross-Network TR Processing Suite</i>)		
Folder Name and Contents	Permissions (as of June 2019)	Permissions (as of July 2019)
<i>Chinook</i> Contains the Chinook Tool	Public Access – Read only Edit Access provided to some staff in the Centralized Network Modernization Innovation and Business Solutions (MIBS) ²	No change

² In each Case Processing Centre (CPC), there are innovation staff. For development of Chinook we used some MIBS employees. They have inherited the permission from their development work. 15-20 staff.

<p><i>Chinook Data</i></p> <p>This folder is a shortcut to the <i>TR > Report > Chinook</i> folder.</p>	<p>Some users are individually identified as having 'Public Access' allowing for Read, Add, and Modify, but not Delete.</p> <p>However, permissions are also granted to entire branches and the entire Immigration Program which supersedes those individual permissions. The group '<i>Immigration Program</i>', which is all users with an immigration function, have full access (Read, Add, Modify, and Delete)</p>	<p>All Immigration Program Staff have Public Access – Read only.</p> <p>Full Access (read, add, modify, delete) is limited to six IRCC employees. Two on the IN Chinook Team, two on the CN Chinook Development Team, and two EDW staff who perform the EDW data extracts.</p>
<p><i>TR Folder > Report > Chinook</i></p>	<p>Some users are individually identified as having 'Public Access' allowing for Read, Add, and Modify, but not Delete.</p> <p>However, permissions are also granted to entire branches and the entire Immigration Program which supersedes those individual permissions. The group '<i>Immigration Program</i>', which is all users with an immigration function, have full access (Read, Add, Modify, and Delete)</p>	<p>All Immigration Program Staff have Public Access – Read only.</p> <p>Full Access (read, add, modify, delete) is limited to six IRCC employees. Two on the IN Chinook Team, Two on the CN Chinook Development Team, and two EDW staff who perform the EDW data extracts.</p>

It is noted that the six individuals have Full Access to the *Chinook Data* folder (technically the *TR Folder > Report > Chinook folder*), and can modify the data files. The risk is considered low due to the number of staff who have Full Access (six) and the general low risk that someone would intentionally or inadvertently change data in the folder. However, in order to upload/update Module 5 information, IN staff must have 'modify' access to the folder and that 'modify' access at the folder level extends to all files within the folder. This is an assumption that requires validation with GCDocs experts. Furthermore, it is noted that all of Immigration Program has read only access to all data files in the folder; it is assumed that the entire program does not require such access.

Privacy Risk Analysis of EDW Data extract Permissions in GC Docs

The new permissions assigned to the *TR Folder > Report > Chinook* folder in July 2019 is clearly an improvement to the prior permissions (June 2019) which allowed Full Access to a large number of staff. However, two issues are present regarding the permissions to the EDW data extracts. First, six individuals can modify the folder and GCDocs permissions to 'modify' are mimicked at the file level. Therefore, there is a risk that one of the six users could inadvertently modify the EDW extract files and negatively impact the processing of applications in Chinook. IN will explore means for the EDW data extracts to be read only while also permitting Module 5 to be uploaded to the folder.

Second, the EDW data extracts are accessible to the entire Immigration Program. Access to the data extracts should be limited to Chinook Experts and a small number of Chinook Administrators in IN and IT Operations.

2.8 Chinook Module Set-Up

Existing Chinook material/guidance suggest to staff Chinook files are loaded daily on the [redacted] and follow the below set up procedures.

The Chinook Expert of the local office creates a folder on the [redacted] for EDW data files. The [redacted] file path for Chinook data is normally: [redacted] *Immigration Program > Chinook > Data*. Reportedly, the Immigration folder is restricted to the Immigration section of the mission, which includes Canadian Based Staff (CBS) and Locally Engaged Staff (LES). However, permissions/restrictions on the [redacted] across all approximately 53 offices was not obtained for this report.

Once those data files are in the appropriate folder every day, the tool is ready for use. Daily, the Chinook SME for an office notifies staff that the daily Chinook data has been uploaded.

3. CHINOOK MODULE DESCRIPTION AND WORKFLOWS

This section provides a description of the Chinook modules and how they are used by IRCC staff.

3.1 Module 1: File Management

To assist in efficiently processing TR applications, on a regular basis, IRCC management inform their staff – made up of CBS and LES – of the types of immigration files which they are responsible for processing. For example, a CBS may be tasked with working on files which have been designated for an expert officer to review the application for eligibility. In the normal workflow, querying GCMS to assign these types of files to oneself is performed in several ways, which can be time consuming. They become even more time consuming when there are GCMS connectivity issues; e.g. mission server availability is slow.

To address these issues and improve efficiencies, Module 1 (File Management) allows users to assign themselves work based on the Tasks assigned to them by Managers. Once a user assigns a series of applications to themselves, they can populate other Chinook modules (Module 3 and 4 for decisions/actions) or export the application data to MS Excel; the Excel spreadsheet promotes more efficient GCMS activities.

In short, Module 1 is designed to assign a large group of files, up to 150, based on a pending Task in GCMS. The Tasks in Chinook align to a data field(s) and activity statuses in GCMS.

While workflows may vary from one office to another, the following depicts a typical workflow in the utilization of Module 1.

Step 1.0: Upload Module 1 Data File

In this step, the IRCC Office Chinook Expert is the only person(s) with the rights to access the Administrator icon in Module 1 (red box in Image 1 below). While the gear icon is visible to all Chinook users, only assigned Administrators can navigate to the administrator area of Module 1.


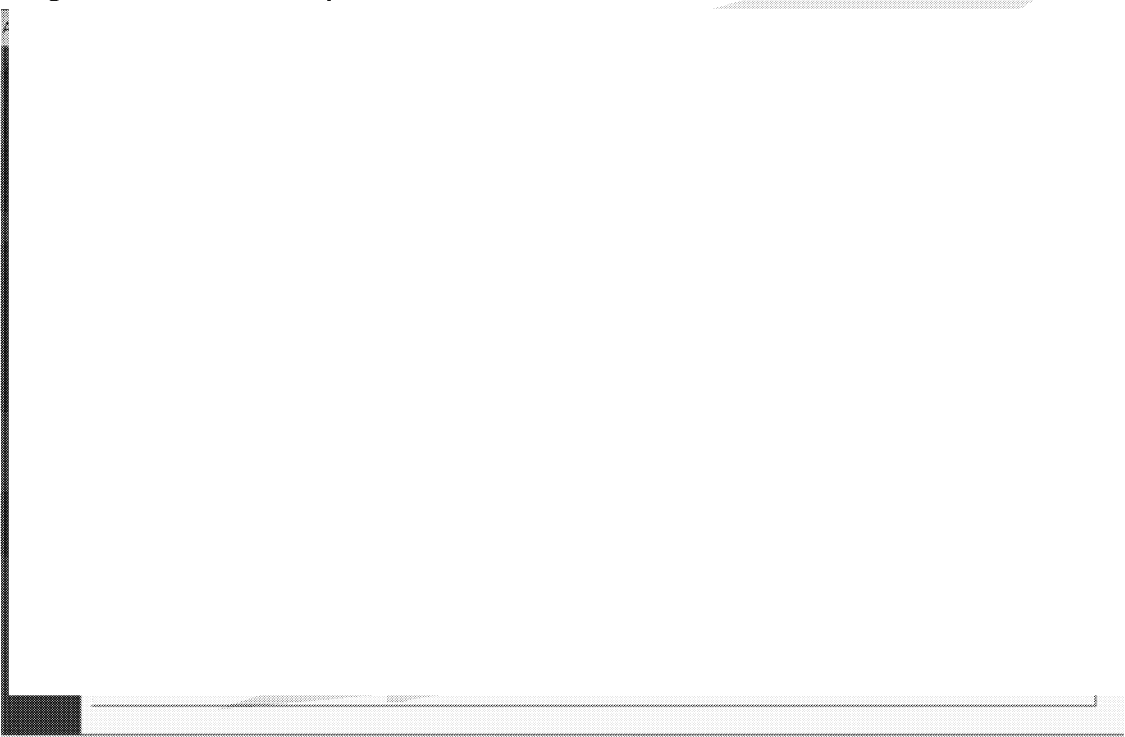
While other functions are available in the Administrator section of Module 1, the main function is for the Chinook Expert to upload the Module 1 data file from the office's  which is depicted in Image 2.

Image 1: Module 1 Main Page



Image 2: Module 1 Data Upload



It is noted that the Module 1 data extract is separate from the Module 3, Module 4, and Module 6 data extracts.

The Administrator section of Module 1 also allows an Administrator to perform other administration tasks within the module, including adding another administrator (manage permissions) and modifying the priority of tasks presented to users in this module.

Step 2.0: Notify staff of Daily Data Upload

In this step, the Chinook Expert ensures staff are informed that the daily Chinook data files have been uploaded to Module 1.

Step 3.0: Search and Review Available Tasks

In this step, users open Chinook in read only format and assign themselves with the type of Tasks management has instructed them to process. To generate a list, a user utilizes the _____ area of the Module 1 Main page (see green box in Image 3 below). From this area, the following search criteria are available to the user:

- A. Assigned To: a specific IRCC employee
- B. Primary Office: a particular Primary Office
- C. Responsibility: the title of an IRCC employee or the type of responsibility activity required for the applications. The Responsible Parties are:
 - 1. Client
 - 2. Officer
 - 3. Program Assistant
 - 4. Third Party
 - 5. Unit Manager
- D. Processing Stage: one of the 19 stages of a TR application process:

- E. Language: a user can identify applications which require responses to the Client in English, French, or both.

The above five search options are visually depicted in the image below; the lettering above corresponds to the lettering in the _____ area of the image below (see green box).

Image 3: File Management/Module 1 – Generate List Criteria

While the number of Tasks and the priority (the order in which they are sorted/presented to the user) of those Tasks may vary from office to office, there are 170 Tasks available for assignment in Module 1. The default Tasks and priorities are based on the logical process flow of a TR application; however, offices have the capability to edit the selection and priority of Tasks. The Tasks in Chinook equate to a data field(s) in GCMS, which varies from one Task to another. Each of those Tasks were analyzed for privacy risks and no risks were identified³. They are simply events that occur in the submission and processing of applications which require actions by IRCC or the client to allow the application to reach a conclusion/final action (approved, refused, withdrawn, other). The following provides a few examples and descriptions of available Tasks; others can be seen in the above image (red box):

1.

2.

³ The consultant analyzed an Excel spreadsheet titled 'Mod 1 SOPs' which lists each task, the type of employee responsible for each task, and the action required of that employee.

3.

4.

10 of the 170 SOPs require the IRCC employee to navigate to Module 3 (and can only be performed by Officers/Decision Makers), while the others require various types of activities to be performed by Program Assistants, the Client, the Unit Manager, and Third Parties.

Step 4.0: Self-Assign Tasks and Navigate to Module 3

In this step, the user selects the Tasks a manager has instructed her to process. As an example, in the image below, the user (Responsibility = Officer) selects the Task of

The Officer can select more than one Task, but in the image below only one Task has been selected. Once the Task(s) is highlighted, the user selects the number of applications to assign to herself and selects '*Generate List*'. Chinook does not permit a user to select/self-assign more than 150 applications. In the image below, the Officer assigns 150 of the available 363 applications with a Task of

Subsequent to selecting '*Generate List*', the 150 applications are populated in the field titled '*List of Applications*'. In the example, after the Officer is finished with Module 1, she navigates to Module 3 where her GCMS User ID identifies those applications which were self-assigned in Module 1; they are now available to the user for processing in Module 3.

Step 5.0: Self-Assign Tasks and Create MS Excel Spreadsheet

While some users will select '*Generate List*' and navigate to Module 3, others do not use Module 3 – non-Decision-Makers (those who do not have the ability to make decisions in GCMS; e.g. Responsibility = Program Assistant). However, Module 1 is still beneficial in that those users can export Tasks in Module 1 to MS Excel where the data is used to efficiently perform actions in GCMS. For example, a user with the Responsibility of Program Assistant assigns 150 Tasks titled

For this specific Task, the TR application has been approved and a letter must be sent to the applicant requesting she submit her passport so that IRCC can affix a Visa to the travel document. Therefore, the Program Assistant selects '*Open Results in Excel*' (and not '*Generate List*'). Subsequently, the Tasks being self-assigned are populated in a newly created MS Excel spreadsheet which contains the following information/column names:

1. Task Name
2. Application Number
3. Application Received Date
4. Group Number
5. Assigned To (IRCC staff)

Subsequently, the Application Numbers from that Excel spreadsheet are used to generate passport request letters in GCMS. Depending on the type of Task, GCMS's grouping functionality may assist in

efficiently performing actions on multiple applications; however, grouping of applications is not available for all Task resolution activities.

The MS Excel document created by the user is stored There is no formal instruction, such as an SOP or Program Delivery Instruction (PDI), which instructs staff or provides guidance on storing and purging any locally stored Chinook data files.

Assigning Files in Module 1 Which Mis-Align to an Employee's GCMS User Role

Within Chinook, it is possible for any user to assign themselves any Task. For example, an employee with the Responsibility of *Program Assistant* can assign herself a Task that requires action on the file in Module 3. However, a Program Assistant is not a Decision Maker and would not action a file in Modules 3 and 4. If this were to occur, the user may even be able to open the application data in Module 3 and record intended decisions in Module 4. However, the eventually decisions must be recorded in GCMS and the individual's base/functional user role in GCMS does not allow her to perform those actions in GCMS.

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Chinook PRA; Version 3.0; August 22, 2019

Image 4: File Management/Module 1 – Generate List and Open Results in Excel



3.1.1 Record Search Utility

The Record Search Utility (i.e. the magnifying glass icon in Image 3) is active for all users. However, most users can only search for records associated to their own GCMS ID within Chinook. Conversely, those with the Administrator role can search for any records.

After selecting the magnifying glass icon, the image below is presented to an Administrator. Based on the search parameters entered, a user is presented with defined search results. For example, this allows Administrators the ability to view the number of files (and Application Numbers) assigned/processed by a particular user. It can also allow the Administrator to see details of a single Application Number.

Image 5: Record Search Utility

Processed File Details

3.2 Module 2: Pre-Assessment

Chinook's Module 2 allows for users to complete pre-assessment tasks on a file. In short, Module 2 allows for a series of tasks to be completed on an application by a Program Assistant to assist the Officer/Decision-Maker when they assess an application and make a decision. Note that Module 2 does not require a specific extract from the EDW.

In the normal course of processing TR applications, Program Assistants are assigned pre-assessment tasks, such as documenting an applicant's

as well as others. Generally, pre-assessment activities verify information in the application and its supporting documents. The outcome

of those pre-assessment activities is the creation of a note on the application which assists the Visa Officer in finalizing a decision on the application. Historically, those notes are time-consuming and inconsistent in the level of detail.

Within Chinook, a user completes a pre-defined checklist for a particular TR application type. Once the checklist is complete, a standardized note is generated which is copied and pasted in the _____ field in GCMS. The following provides a description as to how Module 2 is utilized.

Step 1.0: Identify Relevant Tasks from Module 1

The use of Module 2 begins with the identification of pre-assessment Tasks in Module 1. Once a user has selected a group of Tasks in Module 1, the IRCC staff person (LES or CBS) selects the option of '(

_____) That MS Excel document is stored locally on the user's

_____. The data available to the user in this MS Excel document is detailed in Section 3.1 (Step 5.0), but duplicated here for ease of reference:

1. Task Name
2. Application Number
3. Application Received Date
4. Group Number
5. Assigned To (IRCC staff)

For the purposes of Module 2, from the generated MS Excel spreadsheet, only the Application Number is utilized.

Step 2.0: Copy/Paste Application Numbers into Module 2

In this step, the Application Number(s) is copied from the MS Excel document and pasted into Module 2. In the image below, a single Application Number or multiple Application Numbers can be pasted into the _____ section of the Module 2 Pre-Assessment starting page. Lastly, a selection is made regarding how the applications are presented/ordered in the resulting list. For this workflow, _____ is selected (see green box).

Image 6: Pre-Assessment Start Page/Paste Application Numbers

Module 2 - Pre-Assessment

Step 3.0: Assess Applications

By toggling to the [redacted] tab, the first application in the list is presented to the user with a summary of general application information (green box in the image below):

1. Group #: if the application is part of a Group in GCMS
2. Application Number
3. Category: the category of an application; specifically, V-1, PG-1, B-1, VH-1, CAN+, SX/WX-1, Ret SP/WP, SP and WP⁴
4. Citizenship, and
5. Country of Residence (CoR)

⁴ V-1 = Visitor; PG-1 = Parent/Grandparent Extended Stay, B-1 = Business Class; VH-1 = In Transit; CAN+ = CAN + Program; SX/WX-1 = Short Term Study or Short Term Work; Ret SP/WP = Returning Student Permit Holder/Work Permit Holder; SP = Study Permit; and WP = Work Permit.

From this screen, the user can select previous or next file on the list while a check box reflects whether the Pre-Assessment task has already been completed for a particular application (see red box in the image below).

Image 7: Pre-Assessment Start Page/I

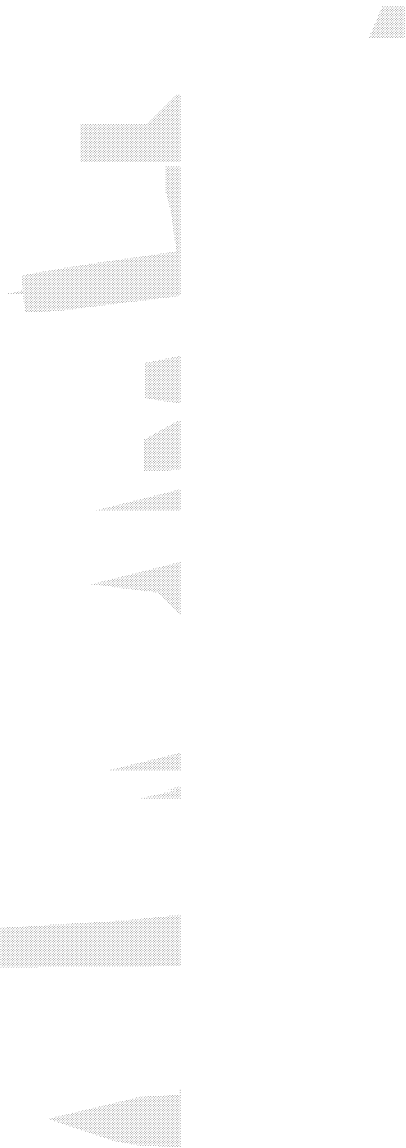


Once the user decides to work on a particular application, she selects the appropriate tab, which is based on the Category (V-1, PG-1, etc.).

Assuming the application presented in the ' ' tab is a V-1 application, the user selects the 'V-1' tab (see image below) and completes the Pre-Assessment tasks. For V-1, the tasks are seen in the below screenshots/images. Note the screen shots are showing what the user sees as she scrolls down through the V-1 pre-assessment (see series of green boxes).

The type of information recorded in Module 2 varies from one Category to another; however, all data is related to the application. There is no new data being recorded in Module 2 that is not already; if the user was not utilizing Chinook, these same pre-assessment tasks are recorded in the normal GCMS workflow.

Image 8: Pre-Assessment of V-1 Application (1 of 3)



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Image 9: Pre-Assessment of V-1 Application (2 of 3)

Module 2 - Pre-Assessment

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Image 10: Pre-Assessment of V-1 Application (3 of 3)

Module 2 - Pre-Assessment



Step 4.0: Generate Note and Paste into GCMS

Once the pre-assessment tasks are completed, the user selected '*Generate Note*' (see green shaded box in the above image) and Chinook creates a pre-defined note based on the selections made during the assessment. The following is an example of the type of note Chinook creates for the user:

IMM STATUS CoR: Citizen|TH: UK/USA/Europe/|PA:|INCOME: 50000PHP/Bi-Week-Pay
 slips|SAVINGS: 75000USD *Lump Sum*-Hist: Provided-Bank Statement |HOST: PA's
 Child; PR STATUS IN CDA;|ADD. INFO: |See Notes in GCMS|JG15841

Once that note is presented to the user, it is copied and pasted into GCMS. Specifically, as seen in the image below, it is pasted into the free text field called **Advanced Analytics (AA) PIA**, the **Free Text** field is a free text field that has multiple uses across the

Department. In contrast to the AA PIA, this PRA has not identified any privacy risks related to the use of the [redacted] field to record the Pre-Assessment Note.

In the future, an existing Change Request is being actioned which will allow for a dedicated field for the above note; Chinook users will no longer use the [redacted] field. At the writing of this PRA, the deployment date for this new data field is undetermined but linked to the Dynamic TR Webforms.

It is noted that the Pre-Assessment Notes from Module 2 are also populated in one of the fields in Module 3; specifically Column G (see Table 7).

Image 11: Pre-Assessment Note Pasted into GCMS



3.2.1 Customization of Module 2

Chinook provides default settings for each application type, which requires assessments to be made across the following areas of an application:

While default settings are set when Module 2 is utilized, IRCC offices are permitted to customize the checklist items. For example, in Image 8, in the section heading of '_____ there are multiple customized checkboxes which would allow an office to reflect that t _____ is identified. That customization would be reflected in the note generated by Chinook.

While certain areas of Module 2 are customizable, the 12 headings listed above cannot be altered; additional headings cannot be added by a user.

3.3 Module 3: Decision-Maker

Module 3 is designed to assist a user in making decisions on TR applications in bulk. The goal of Module 3 and Module 4 is to increase the quantity and quality of decision making by compiling, in one place, the pertinent information required for making decisions. From a single location, the data can be reviewed more easily and effectively along with

This module introduces a better viewing platform to review application information of numerous files at the same time. Most of the information in Module 3 is GCMS data from the Module 3 EDW data extracts. The only exceptions are the following:

1. Column D: Action –Chinook user records their intended decision on the TR application.
2. Column G: Pre-Assessment Notes – if the office uses Module 2, the note created in Module 2 is auto-populated in this column.
3. Column Z: Module 5 _____ – see Section 3.5.
4. Column AA: _____ – see Section 3.3.2.
5. Columns AB through AG: _____ – See Section 3.3.1.

The following tables provides a description of the Module 3 columns.

Table 7: Module 3 Column Descriptions	
Officer Section (Columns B through F)	
Column Number and Name	Description
B. Application Number	GCMS Unique number assigned to application
C. Group Number	GCMS unique number assigned to group (if applicable)
D. Action	Approved, Refused, Withdrawn, Other. This is where the decisions are made once assessments are completed on an application.
E. Working Note	Working Note regarding the application such as 'Request PG-1' or 'Request Meds'
F. Assessments Rollup	
Client and Application Information Section (Columns G through U)	

Column Name	Description
G. Pre-Assessment Notes	Notes from any pre-assessment done in Module 2
H. Verbose Client Information	If the user hovers over this field, the long form narrative of the application is presented to the user. An example is provided in the image below.
I. Category	Counterfoil category (V-1, PG-1, etc._)
J. Special Program Code (SPC)	e.g. CUS
K. Received Date	
L. Citizenship	
M. CoR	
N. Gender	
O. Marital Status	
P. Age	
Q. Purpose of Visit	
R. Purpose of Visit Information	
S. Activity and Employer/School/Facility	
T. Self Declared Travel	From application; e.g. USA 2019-May; Japan 2018-Jan.
U.	
GCMS Information Section (Columns V through Y)	
Column Name	Description
V. Previous GCMS History	
W.	
X.	
Y.	
Historical Data Section (Columns Z through AG)	
Column Name	Description
Z.	Module 5 are identified in this column – see Section 3.3.3
AA.	See Section 3.3.2
	See Section 3.3.1

Image 12:**Step 1.0: Open Chinook Module 3**

At the onset of using Module 3, the following disclaimer is presented to all users as a pop-up dialogue box. Users must select 'OK' before proceeding with the use of Module 3.

THE PRESENTED IN CHINOOK ARE FOR INFORMATION PURPOSES ONLY
AND ARE NOT PREDICTIVE. OFFICERS MUST REVIEW ALL APPLICATIONS ON THEIR OWN
MERIT.

The percentages referenced in the above notice is related to the columns in Module 3 which are described later in Section 3.3.1 below. Furthermore, the references to exemptions under the *Access to Information Act* have not been reviewed by IRCC ATIP.

Users are informed to open Module 3 in Read Only; however, there are instances wherein Officers have saved the file on is unknown.

Step 2.0: Select Appropriate Module 3 Data File and Customize Columns

To start using this module, an Officer/Decision-Maker navigates to the module's set up screen (the gear icon). In the Set-Up screen, the user enters their Region, GCMS ID, and the Data File being queried (located in the office's . While most staff do not require access to more than one data file, a small number of IRCC employees are decision-makers for multiple regions and will need to ensure they select the appropriate regional Module 3 data file.

Furthermore, via the '*Module 3 Options*' (see green box in below image), a user can activate/deactivate various columns, as well as deactivate/activate the columns.

Image 13: Module 3 Basic Setup

MODULE 3 - Decision Maker

— □ ×




Further customization can be achieved by selecting the '*Column Setup*' tab in the above image (see blue box), which presents the user with a series of check boxes. By de-selecting an option, Module 3 will remove that column from view. Through anecdotal reports, more experienced Officers often de-select the columns through the Basic Setup or Column Setup feature of Module 3.

Image 14: Module 3 Column Setup



Step 3.0: Load Assigned Applications

To populate applications in Module 3, a user can rely on activities performed in Module 1. Data can be migrated into Module 3 through Module 1 via two methods. First, the Tasks that are self-assigned in Module 1 can generate an MS Excel document. From that Excel spreadsheet, which is most likely stored on the  the string of Application Numbers can be copied/pasted into Module 3; identical to how Module 2 data is populated. Second, by entering in their GCMS User ID in Module 3, the Application Numbers (assigned via Module 1) are auto-populated in Module 3 – the GCMS User ID must be entered in Module 1 and subsequently entered in Module 3 via the gear icon.



As Chinook is used for paper applications as well, Module 3 also supports the scanning of a paper applications. To scan applications, the user selects '' and a separate window is presented. Using a 2d bar code scanner, the user can scan the bar codes on paper applications. In the image below, the user has selected '' and the scanning dialogue box is presented to the user.

Image 15: Module 3 – Scan Applications



25				
26				
27				
28				
29				
30				
31				
32				

Step 4.0: Receive Assignments from Manager (Alternative Workflow)

It is noted that some managers will identify Tasks to be assessed/actioned by their employees in Module 1, populate Module 3, and subsequently email their staff personalized Chinook files. Unlike the normal work flow, which requires staff to open Chinook in ‘*Read Only*’ and not : this assignment activity by a manager results in a copy of Chinook being stored c

Step 5.0: Record Decision in Column D (Action)

Once applications are assigned to a user (either self-assigned or via a separate Chinook document), the Officer utilizes the spreadsheet to make decisions on up to 150 applications which are presented in this module in rows. This allows for the consideration of GCMS data and other information to support a decision. The three decisions in Chinook/GCMS are: Approved, Refused, and Withdrawn. In Chinook,

there is also 'Other' which means the application is not ready for a final decision; e.g. the file needs meds or screening.

Once a decision is made, Module 4 is utilized. While Chinook and this deliverable separate Module 3 and 4 as distinct and separate, both modules are incorporated into the same worksheet.

3.3.1

Columns AB through AG provides statistical information based on

Chinook uses the profile information provided in the

The following three examples illustrate how each of the above three rules apply:

-

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Image 16: | Section (3 and 6 filters)

In addition to similarities to the _____, the _____

The _____ as well as the accompanying business rules, were not approved formally, but informally; i.e. the Director General of IN did not formally approve of the criteria and business rules but was aware of the work being performed and, once tested and validated, they would be incorporated into Chinook.

Privacy Risk Analysis - Notice

From a privacy point of view, several factors of the [REDACTED] information were considered. First, as it relates to notice, a minor risk was identified. The consultant does not believe the presentation of [REDACTED] ; predictive analytics, or is remotely close to the activities described in IRCC's AA PIA, however, the enhancements to transparency and notice stemming from that PIA are robust enough to account for the presentation and consideration of statistical data [REDACTED] within Chinook. Furthermore, it is sufficient for the [REDACTED] as well.

Considering the AA PIA focused entirely on TRV applications and the use of IMM 5257 (Application for Visitor Visa), the consultant also analyzed the notice provided in applications for SPs and WPs; specifically, for IMM 1294 (Study Permit Application) and IMM 1295 (Work Permit Application). IMM 1294 (SP Application) and IMM 5257 (Application for TRV) contains the following information, in part, in the Privacy Notice Statement (PNS):

The personal information collected on an application, and other information collected in support of an application, may be used for computer analytics to support processing of applications and decision making, including your application. Personal information, including from computer analytics, may also be used for purposes including research, statistics, program and policy evaluation, internal audit, compliance, risk management, strategy development and reporting.

In the opinion of the consultant the above text adequately meet the Notice requirements related to the use of [REDACTED]. However, it is noted that a similar paragraph does not exist in IMM 1295 (WP Application). Therefore, this PRA identifies this risk with a recommendation to include the above statement in IM 1295.

Privacy Risk Analysis - Accountability

Second, as it relates to the creation of the [REDACTED] section and the use of [REDACTED] there is a risk related to the privacy principle of Accountability. That risk is that there is a missing governance structure for the creation, modification, and use of the [REDACTED] sections in Chinook, as well as other aspects of the tool. The lack of an appropriate and formalized governance framework in the deployment of Chinook extends to, at least, the following:

1. [REDACTED] in Module 3
2. Module 5 [REDACTED] as noted later in this report, there are approximately [REDACTED] in operation which were not formally approved through an approved governance structure.

3. [redacted] similarly, the creation and approval of [redacted] should be formalized in governance such that it remains a section to identify [redacted]. There is a risk it could result in the creation of [redacted] and not its current use of assistance in triaging.

In the risk section of this report, a recommendation suggests a governance structure for all of Chinook should be formalized, which will, in part, prohibit the deployment of new criteria or the modification of existing criteria without formal approval from an 'Officer of Record'.

Furthermore, a separate risk under the principle of Accountability suggests the use of the [redacted] must be justified – the effectiveness and necessity of the tool must be recorded to allow the tool to be used and

Privacy Risk Analysis - Accuracy

Third, there is a risk related to Accuracy regarding the [redacted] in Module 3. While the TR SMEs tests of prior data suggest the [redacted] are relevant factors for officers to consider, there should be further assessments/tests scheduled in the future to ensure those criteria remain relevant and valid. Along with that requirement, it is further suggested that statistical data is maintained on further assessments and are considered by the 'Officer of Record' prior to the addition or modification of criteria.

Privacy Risk Analysis – Necessity and Effectiveness

Fourth, for this PRA, the consultant does not support a deep analysis of the Four Part Oakes Test⁷ regarding the use of [redacted] however, there is a need for IRCC to at least be confident that the presentation of data across the [redacted] is necessary and is effective in meeting a need. Because senior officers deactivate columns and temporary staff may be [redacted] IRCC should ensure the criteria are being used by staff, are effective ([redacted] and that statistical data continue to support the use of [redacted] and the corresponding business rules (accuracy).

Privacy Risk Analysis – Impact of TBS Directive on Automated Decision Making

Lastly, there is a correlation to the use of the [redacted] columns and the TBS *Directive on Automatic Decision Making*. While the consultant believes significant differences exist between predictive analytics and the presentation of statistics (i.e. [redacted] IRCC must determine the implication, if any, of that Directive on the development and deployment of Module 3 and Module 5. It is the opinion of the consultant that Chinook does not deploy predictive analytics and that the TBS *Directive on Automated Decision Making* does not apply.

⁷ The OPC expects PIAs that are particularly intrusive or privacy invasive to be analyzed against the Four Part Oakes Test; see Section 2.1 of the OPC *Expectations: A Guide for Submitting Privacy Impact Assessments to the OPC*.

3.3.2 Section –

In Module 3, Column AA, _____ is a data field which presents _____ for all offices or specific offices. The identification of an application that contains any of the _____ is utilized for triage purposes only. I

If an application contains any of the keywords, instruction is provided to the officer via Module 3, Column AA, [REDACTED]

The existing (as of July 2019), which are enumerated in the table below, were approved for use without a formal approval process. The were in use prior to Chinook, therefore, they were added without the approval process. Furthermore, the for all offices were added by IN staff to support triaging. However, beginning in or around Summer/Fall 2019, the addition or deletion of keywords will be managed through a Module 5 submission template, which requires approval from the RAOC in Ottawa although any will not reviewed as thoroughly as a Mod 5 indicator as the purpose of local triage only. A specific template has not been created yet but will likely be similar to the template used to submit request for a Module 5

The current list of the offices for which the apply, and the value displayed in Module 3 Column AA is listed below.

[illegible]

[illegible]

Section – Module 5

Once a Module 5 is approved by the RAOC, it is presented to users in Column Z. A description of the existing Module 5 and the approval process is provided in Section 3.5.

3.4 Module 4: Post-Decisions

Module 3 deals with informed decision-making; Module 4 deals with terminal actions from those decisions. While seen as a separate module, the decision in Chinook is performed by selecting the Actions Column in Module 3. When selecting a particular cell in this column, the following dialogue box is presented to the user.

Image 17: Refusal Action and Note



In the example above, the user has decided to refuse the TRV based on the refusal ground of *'Length of Stay'*. In selecting the checkbox for *'Length of Stay'* a standardized Refusal Note is auto populated by Chinook. That note can be modified (edit or add detail).

After several decisions have been actioned, the user can utilize GCMS's bulk approval/refusal function in order to copy/paste TR application decisions (and the notes).

In the image below, the Officer has approved eight applications and refused one (red box). Two of the approvals include a *'Working Note'* specifying that the approval is for a singly entry only (blue box). Moreover, five of the application numbers are associated with an existing Group in GCMS (green box).

Image 18: Selection of a Group of Files for GCMS Action

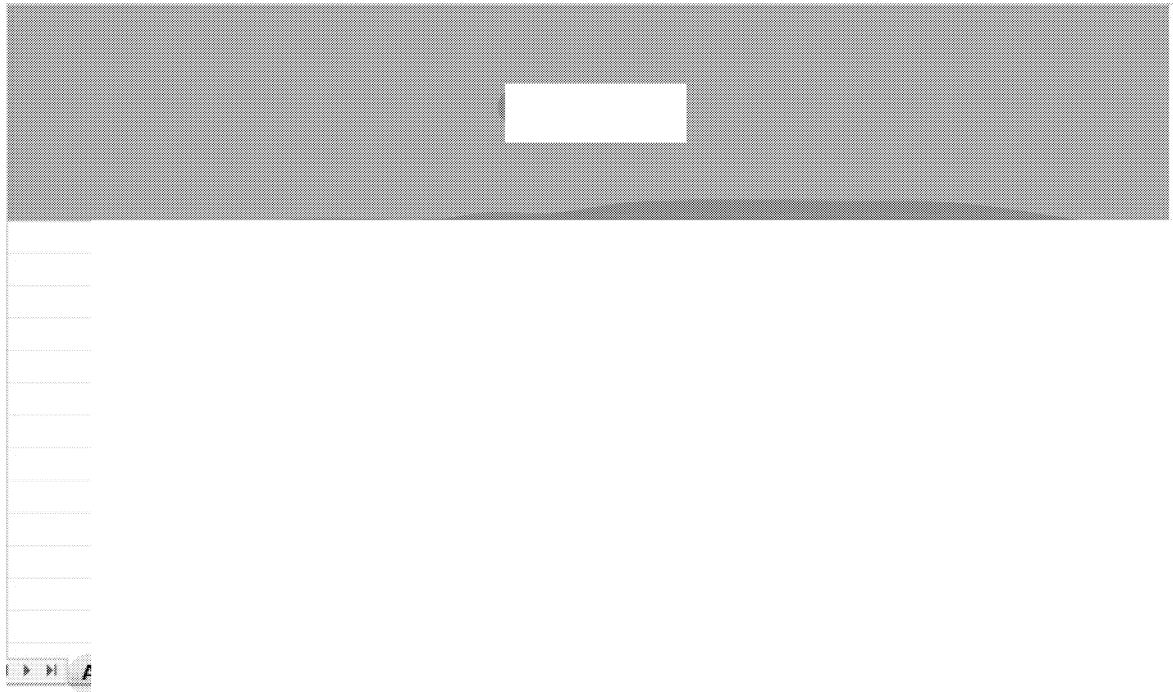
The user selects all nine applications (via the Action column) and Chinook creates a separate workbook is created in MS Excel – separate from Chinook (see Image 19). This new worksheet is most often saved that office.

Image 19: Separate MS Workbook Created for Approval Lists

Within that new MS Excel spreadsheet, each set of files (set, groups, or single application numbers) is presented in one of several tabs for *'Approvals'*, *'Refusals'*, *'Withdrawn'*, or *'Other'*. As seen in the image below, which depicts the Approvals Tab, each set of files is organized as follows:

1. **All Files Query String:** includes all files designated for that action
2. **Single File Query String:** includes all files that are not presently in groups.
3. **Group File Query String:** String of all groups containing the files for action.

Image 20: Separate MS Workbook – Approvals Column



Bulk Approvals

In the above image, there are nine applications to be approved, all of which are applications within a group. To action a bulk approval, it requires the creation of a Temporary Group where all actions can be assigned; however, GCMS does not permit more than one group to be assigned to a particular individual. Therefore, for any applications which are already in a GCMS Group, the existing group must be closed before a Temporary Group is created and bulk actions are performed.

To close an existing group, a user copies the '*Group File Query String*' (red box) from Image 20, and pasted into the '*Groups > IMM*' Screen of GCMS (see Image 21). Subsequently, the search presents all the groups and the '*Status*' of each is changed from '*In Progress*' to '*Closed*' (see red box in Image 22).

Image 21: Close Existing Group Numbers (1 of 2)

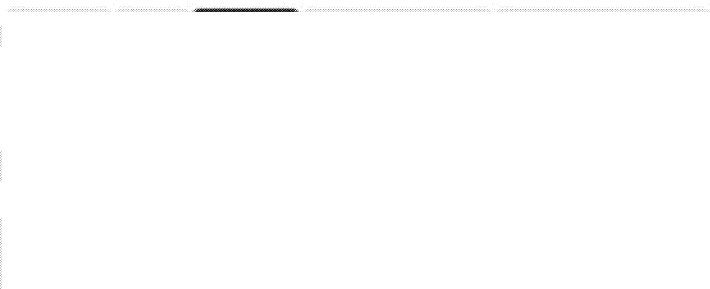



Image 22: Close Existing Group Numbers (2 of 2)



The screenshot shows a web form for managing GCMS groups. The form has a header bar with 'Group', 'Menu', 'New', and 'Query' buttons. Below the header, there are several input fields: 'Group #:' with the value '1-FQVY224', 'Name:' with 'MESINA_M_1946', 'Type:' with a dropdown menu showing 'TR - Family', 'Status:' with a dropdown menu showing 'In Progress', 'Responsible Office:' with 'Manila', and 'Create Date:' with '2018/04/16 02:41'. A red box highlights the 'Status:' dropdown menu.

Once the existing GCMS Group is closed, existing Bulk Action activity in GCMS is performed. To perform Bulk Actions (e.g. Approval, Refusal) in GCMS, a Temporary Group is created. Once created, the user copies the 'All Files Query String' (see Image 20; blue box) and performs the bulk approval.

Refusals

In Image 20, there are three tabs for Refusals: *Refusal (1)*, *Refusal (2)*, and *Refusal (3)*. The actions for bulk approvals is the same for bulk refusals, except that Chinook creates a separate worksheet in Excel for applications with the same grounds for refusal. Therefore, in Image 20 (see the green box), there are three worksheets containing applications with three types of refusal grounds.

3.5 Module 5: Indicator Management

Module 5 (Indicator Management) allows for new and existing risk indicators to be created and viewable in the 'Module 5' columns of Module 3 (Column Z).

The 'indicators being identified automate what is already created in the form of quality assurance (QA) reports. For example, (

The results of the QA report are communicated to staff and are considered in the processing of future applications.

Therefore, Module 5 was initially created to allow IRCC to build indicator rules for both positive and negative factors. To ensure biased and unwarranted risk indicators are not created, IRCC has developed guidelines and a process by which its global network of Risk Assessment Officers (RAOs)¹⁰ can request the creation of risk indicators in Chinook.

As of June 2019, the process and guideline were recently introduced. The workflow described below will be followed in the future. However, the current inventory of Module 5 rules (shown to the user in Module 3) did not follow the guideline, but were assessed by IN's RAOC, who is responsible for approving all Module 5 rules in the future.

The consultant did not review all of the existing rules, but reviewed a sample size of 17. The following are five of those 17. If the criteria are met,

Example 1:

Example 2:

¹⁰ There are approximately 20 RAOs across the IRCC international network. .

Example 3:

Example 4:

Example 5:

•

•

Going forward, IRCC is establishing a more robust assessment process and tools. Module 5 is used to submit requests to approve a new [redacted]. For most users, their installation of Chinook Module 5 contains only the Module 5 Submission Template, which a RAO completes to seek approval of a new [redacted]. For IN's RAOC, who is responsible for approving and denying requests, Module 5 allows her to create the [redacted] such that it is identified in Module 3. In Module 3, the *Instructions to Officer* is provided; not the criteria or rationale. That criteria and rationale are only stored in the Module 5 tool and accessible to the RAOC.

The following high-level workflow explains the process of a RAO submitting a template, the approval process, and the creation of the [redacted] in Module 5 and Module 3.

Step 1.0: Perform Risk Assessment; and

Step 2.0: Complete and Submit Module 5 Template

As of June 2019, RAOs, of which there are approximately 20, can refer to the [redacted] in their QA report and risk analysis and the Chinook Mod 5 Indicator Submission Template to assist with documenting the source criteria, logic and rationale in the creation of sound risk indicators. The tools available to RAOs to support the creation of [redacted] were being revised at the writing of this deliverable.

In Step 2.0, the RAO completes the Chinook Module 5 Indicator Submission Template (herein referred to as the Mod 5 Submission Template). It is noted that Module 5 can be used to identify both risks [redacted] and opportunities ([redacted]). The Mod 5 Submission Template requires the following information:

1. **Summary of the Submission:** a free text field which provides a brief summary of the desired indicators and justification for the creation of an indicator(s).
2. **Source:** a drop-down menu requires one of the following values:

¹¹ These Rule Types have been identified by IN and are supported by Integrity Risk Management (IRM). Other types may be added in the future, but are not anticipated as of July 2019.

10. **Other:** to provide any other pertinent information which could not be included in other sections of the template.

Once completed, the completed Mod 5 Submission Template is saved locally by the RAO and emailed to IRCC.INRAO-AORRI.IRCC@cic.gc.ca.

Step 3.0: Review and Approve/Deny Module 5 Indicators; and

Step 4.0: Action Mod 5

At the writing of this PRA, one person identified as the IN RAOC has been designated as authority to approve, modify, or reject the indicators submitted. The existing process to approve is a subjective assessment by the RAOC; however, a framework for the approval, revalidation, tracking, audit, and removal of Module 5 is being developed, but was not available for assessment by the privacy consultant. Once approved, the RAOC creates a Module 5 which is depicted in the image below.

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Image 23: Create Module 5

frindicator



Step 5.0: Resubmit Module 5 Template (Renew Existing Indicator)

Risk indicators remain valid (see red box in the above image).

may be adjusted in the future.

When the , the requesting RAO must revalidate and resubmit the Mod 5 Submission Template to . However, IN is current determining if this approach can be modified and risk indicators can be scored automatically so that the RAOC is able to perform other necessary functions of the position.

Step 6.0: Maintain Module 5 Indicator Repository

IN's RAOC will maintain a repository of rules which will define the date

3.6 Module 6:

a QA report of Module 3

The Module 6

Through this module, IRCC is trying to solve the issue of and is meant to provide more value-added feedback to officers and to identify gaps in training to be addressed.

Image 24: Module 6 Reporting Dashboard



4. SUPPORTING ACTIVITIES

This section provides a description of various activities that support the use of Chinook and have been deemed relevant to this PRA.

4.1 Data Storage

The issue of data storage and the risk of multiple data repositories was considered in this PRA.

First, when employees utilize Chinook, support staff continually advise that users open Chinook in 'Read Only'. This assists with preventing corruption issues in Excel, various add-ins, and prevents multiple copies of Chinook being stored on local drives. However, there is a risk that users select 'Save As' and maintain a separate installation of Chinook and GCMS data.

Second, as it relates to the potential for EDW data extracts to be emailed from one user to another, the file size of the extracts are very large. Module 3 data files exceed 100 MB which can't be emailed, while data files are smaller but are often in excess of IRCC's 10MB file limitation for email attachments. Therefore, it seems impossible or very difficult for a user to email a copy of any EDW extracts which are saved on the office

Third, there are instances wherein a Manager/Supervisor identifies Tasks to be assessed/actioned by their employees in Module 1, populates Module 3 with up to 150 assigned Tasks, and subsequently emails the populated Chinook file (Mod 3) to the employee. Unlike the normal work flow, which results in staff opening Chinook in Read Only (and no local copy is stored), this assignment activity by a manager results in a copy of Chinook being stored on

Fourth, in Module 1, '*Open Results in Excel*': The MS Excel document created by the user is stored locally on the individual's However, this does not involve a data file with significant personal information. It only contains the following:

1. Task Name
2. Application Number
3. Application Received Date
4. Group Number
5. Assigned To (IRCC staff)

During training, Chinook Experts inform all users that local copies of Chinook or MS Excel files must not be maintained. However, there is no formal instruction, such as an SOP or Program Delivery Instruction (PDI), which documents that mandate.

In the end, it appears that Chinook requires training and awareness to all staff regarding the localized storage and retention of Chinook data. Such training and awareness should encourage 'Read Only' versions of Chinook; however, where localized storage must occur, deletion must be performed in a sufficient timeframe; i.e. delete all localized copies and emails containing Chinook/GCMS data.

4.2 Information Management

In review of the information in Chinook, most Chinook data is a copy of data from GCMS. Therefore, from an information management (IM) perspective, Chinook seems to be transitory data. However, the presentation of [REDACTED] in Module 3 and the creation of Module 5 indicators (presented to users in Module 3) may not be considered transitory information. Therefore, it seems necessary for IN to collaborate with IRCC IM to determine if Chinook, in its entirety or portions thereof, are transitory or if Chinook is a System of Record (SOR).

From a legal perspective, and not a privacy one, there is a need for a file's progress and officer considerations to be traced. Understanding and being able to replicate the considerations and decisions of an Officer is sometimes integral to court proceedings involving refused TR decisions. Two points are made regarding this nuance to Chinook.

4.3 Security of Module 3

Module 5

During the preparation and completion of the AA PIA, risks were initially identified related to the security designation of those rules. As a result of those risks, IRCC determined the

[REDACTED] While the Module 3 [REDACTED] columns and Module 5 [REDACTED] (presented in Module 3) are not opined to be the use of predictive analytics, the security designation of that information should be analyzed by IRCC.

The Module 5 [REDACTED] five of which are duplicated in this PRA, may reach the threshold of Secret, but that should be determined by IRCC.

Regardless of the consultant's opinion, it is IRCC's Departmental Security Officer (DSO) who is the Department's authority on the designation/classification of Protected/Classified information. The DSO should be consulted to ensure proper protections are afforded the data described in this section.

5. PRIVACY RISK ANALYSIS

The privacy risks below were identified after analysis of the previous four sections of this PRA.

The level of risk assigned to each of the risks was based on three existing IRCC documents. First, as recommended by IRCC's Corporate Risk Profile for FY 2016-17, the IRCC 15-minute risk assessment tool was utilized which includes a 3 x 3 matrix (Impact x Probability). Second, to assist in assessing the impact, IRCC's Common Risk Impact Scale (CRIS) was used. The CRIS includes specific guidance and examples related to privacy and security. Third, to assist in assessing the probability, IRCC's Common Risk Probability Scale (CRPS) was used. The outcome is reflected in the 'Risk Assessment' description for each risk below.

In the completion and assessment of this PRA deliverable, the consultant agrees with IRCC's stance that a PIA is not required. The most prevalent argument for not authoring a PIA is that, in the opinion of the consultant, the use of Chinook does not meet the '*substantial modification*' threshold as defined and described in the TBS *Directive on Privacy Impact Assessment*.

5.1 Accountability

Risk #1: There is a risk that the [redacted] in Module 3's [redacted] Section is inaccurate, ineffective and unnecessary in the processing of TR applications. The use of the criteria may result in significant and unnecessary [redacted] on while most senior staff de-activate the columns.

Risk Assessment: Possible/Medium

Recommendation: It is recommended that IRCC validate the necessity and effectiveness of the [redacted] such that it supports the continued presentation of the criteria in Module 3. Specifically, determine if the columns are being considered/reviewed by staff, are effective (including no [redacted]) and that ongoing statistical data/analysis continues to support the use of the [redacted] criteria and the corresponding business rules.

Risk #2: There is a risk that Chinook is not a temporary tool and that it will be a long-term solution to assist in the processing of TR applications. Moreover, it could be expanded to process other IRCC applications. This deliverable reflects IRCC's current plan to use Chinook as a model for business requirements; i.e. TDSS will build GCMS functionality, or similar tool which integrates with GCMS, such that Chinook is no longer required. However, considering Chinook was built, in part, because GCMS access/connectivity is slow and/or unavailable at times, the consultant questions how TDSS will be able to replace/decommission Chinook.

Risk Assessment: Possible/Low

Recommendation: It is recommended that IRCC consider this risk and ensure contingency plans are in place to ensure proper privacy protections are in place if Chinook becomes a long-term solution or is expanded to other application types. The improvements to the governance structure recommended in Risk #3 should be organized in such a way that expansion of Chinook, or significant changes, requires formal approval involving privacy risk analysis. Furthermore, other risks in this deliverable should be considered with any expansion or permanency to Chinook.

Risk #3: There is a risk that Chinook continues to operate without a formal governance structure which could negatively impact necessary privacy protections. The deployment of the tool appears to have been adopted with the knowledge and implied approval of senior managers in IN. However, a more formal governance structure is lacking. As Chinook has been expanding, formalized approvals are not in place, especially those related to Module 5 and the [redacted] section in Module 3. The existing functionality and potential expansion require a more robust governance structure.

Risk Assessment: Possible/Medium

Recommendation: It is recommended that IRCC develop a formal governance structure to support the development, management, and necessary privacy protections related to Chinook. At a minimum, the governance structure should address the following:

1. Generalized Approval Authority: An identified approval authority in charge of approving changes to Chinook, as well as ensuring other aspects are present, such as technical training, awareness, and privacy protections related to data files. All significant changes to Chinook, including the addition of other IRCC lines of business must be formally approved.
2. [redacted] in Module 3. Notwithstanding the outcome of Risk #1, the continued use and performance testing of these criteria should be well-documented. The continued approval of these criteria should be actioned periodically by a senior approval authority and must consider the testing results in determining whether to continue using any of the [redacted].
3. Module 5 All future [redacted] indicators should be assessed through a documented and formal process. That process should include a requirement that [redacted]
4. [redacted] Similar to Module 5 all [redacted] should be assessed through a documented and formal process. That process should include a requirement that the creation and approval of [redacted] should be formalized in governance such that it remains a section to identify critical triage elements. There is a risk it could result in the creation of [redacted] and not it's current use of triage assistance.
5. Procedures, Training and Awareness: existing material must be updated, or created, to support privacy protections such as data storage, purging, use, access, and disclosure. Changes appear to be necessary in Chinook Procedures, training, and awareness. Specific privacy awareness is lacking entirely.

Risk #4: There is a risk that Chinook's use of Module 5 and the _____ section of Module 3 is inconsistent with TBS's *Directive on Automated Decision Making*.

Risk Assessment: Unlikely/Medium

Recommendation: It is recommended that IRCC determine if the use of Module 3 and Module 5 data _____ and Module 5 _____ utilize analytics in a manner wherein the TBS *Directive on Automated Decision Making* applies. As stated in this report, the consultant opines that the Directive does not apply; however, such a decision should be made by IRCC.

5.2 Identifying Purposes

Risk #5: There is a risk that WP Applications are being processed in absence of proper notice to the applicant that prior _____ is used for reporting and statistical purposes and that such data may be used to support the processing of the individual's application. Proper Notice/Transparency exists in the TRV and SP application processes, but is lacking on the WP application; Form IMM 1295.

Risk Assessment: Possible/Low

Recommendation: It is recommended that IRCC modify the Privacy Notice Statement (PNS) on Form IMM 1295 (paper and e-application) such that it contains the following paragraph which is found in the PNS on application form for TRV and SP:

The personal information collected on an application, and other information collected in support of an application, may be used for computer analytics to support processing of applications and decision making, including your application. Personal information, including from computer analytics, may also be used for purposes including research, statistics, program and policy evaluation, internal audit, compliance, risk management, strategy development and reporting.

5.3 Consent

No risks were identified regarding this principle.

5.4 Limiting Collection

A potential privacy risk exists in that the self-assignment of tasks in Module 1 and the actioning of those in Module 3 allows some staff access to more data than they should; or more data than their user role allows for in GCMS. However, the consultant was assured of the following:

1. Access to GCMS data in Chinook does not provide any user with access to more data than it currently has in GCMS. All CBS and LES staff who have access to GCMS currently have access to all of the data elements in Module 1 and 3.
2. A LES Program Assistant, whose role in GCMS cannot approve or refuse an application, can self-assign decision-maker tasks in Module 1 and record approvals or refusals in Module 3. However, they could not perform the application-specific or group approvals/refusals in GCMS.

IN staff interviewed for this PRA provided verbal validation that the above factors are accurate. However, IN was unsure if this extended to permissions/restrictions placed on EDW data extracts which are stored in office

Furthermore,

Therefore, this risk is not identified in this section.

Risk #6: There is a risk that access to the GC Docs folder where IT Operations staff upload daily EDW extracts allows more access than is necessary/justified. New permissions were assigned to the folder in July 2019. Those new permissions are clearly an improvement to the prior permissions (June 2019) which allowed Full Access to a large number of staff. However, under the new permissions, six individuals can modify the EDW Extract data files in the folder and, potentially, have a negative impact on the processing of files in Chinook. Conversely, there is a need for IN staff to modify at the folder level to upload Module 5 indicators and IN is exploring a permissions options which allow Module 5 files to be added to the folder while restricting access to the EDW extracts to read only and to as few users as possible. Secondly, the EDW data extracts are accessible via Read Only to the Access to the data extracts, even in Read Only format, should be limited to Chinook Experts and a small number of Chinook Administrators in IN and IT Operations.

Also, this risk extends to the permissions assigned by local offices to the Chinook data files in each local In interviews for this report, the permissions/restrictions applied to in the approximately 53 offices was unknown.

Risk Assessment: Unlikely/Medium

Recommendation: It is recommended that IRCC restrict access to the EDW extracts to the least number of staff as possible. Furthermore, it is recommended that once EDW data is extracted and stored in the folder for consumption by IN offices, the data files cannot be modified.

Recommendation: Chinook Experts should be instructed that access to the EDW data extracts via the should be 'Read Only' and limited to the least number of people as possible.

5.5 Limiting Use, Disclosure and Retention

Risk #7: There is a risk that Chinook is a System of Record (SOR) and the daily purging of data files is inconsistent with the retention practices of TR application data. Furthermore, IRCC must consider the

Risk Assessment: Unlikely/Medium

Recommendation: It is recommended that IRCC consult with the Department's Information Management (IM) SMEs to determine if Chinook is transitory information or if it is a SOR.

Recommendation:

t

Risk #8: There is a risk that Chinook Experts, who are responsible for purging EDW extracts on a daily basis, are not doing so. There has not been audit, or survey conducted, to ensure such purging is being performed.

Risk Assessment: Unlikely/Medium

Recommendation: Notwithstanding the outcome of Risk #7, it is recommended that IN's awareness material remind Chinook Experts that their [redacted] should contain only one version of each EDW data extract. Furthermore, IRCC should consider audits or surveys of office [redacted] to ensure that instruction is being followed. The Chinook governance structure should formalize this awareness and audit capability.

Risk #9: There is a risk that there are multiple copies of Chinook being stored by Officers/Managers in email accounts and local drives. Through this PRA, this risk is present in at least the following areas:

- Officers/Managers create a list of Tasks in Module 1 and populate those Tasks into Module 3 for an Officer to process. The locally saved Excel document/Chinook copy is emailed to the officer and results in a copy of Chinook being saved on multiple local drives and email folders.
- Officers open Chinook and saving it locally, versus opening Chinook it in Read Only, as suggested by Chinook support staff.
- Module 1 can be exported to Excel, where the user will save the file locally for use in GCMS or in Module 2. The risk of Module 1 data is far less than other areas because the data exported to a separate Excel document contains very little personal information, which has minimal sensitivities (e.g. Application Number).
- In Module 4, when decisions are actioned, a separate workbook is created, which is likely saved locally by users.

Furthermore, in the future, as Chinook is used more, there are potential efficiencies in creating multiple copies of certain files. For example, if CN/OSC were to be utilized to action refusal notes/letters again (similar to Project Peacock), multiple versions of Chinook or Chinook data will be required; i.e. a master spreadsheet will be created and emailed to OSC who will perform actions in GCMS.

Risk Assessment: Likely/Low

Recommendation: It is recommended that Chinook procedures and awareness are issued to staff regarding the creation, retention, and destruction of Chinook versions. Focused procedures and awareness should be placed on the examples provided in the above risk statement.

It is recognized that IRCC may permit the short-term and local storage of Chinook data files. Ultimately, it is recommended that IRCC develop requirements which limit localized versions of Chinook that are kept longer than necessary. Requirements and awareness should support the purging of data files so that hundreds or thousands of Chinook/GCMS data files are not stored throughout shared drives, email accounts, and localized storage devices.

5.6 Accuracy

No risks were identified regarding this principle that have not already been identified in another risk; for example, see Risk #1.

5.7 Safeguarding

Risk #10: There is a risk that Module 5 [REDACTED] are not being safeguarded in accordance with Protected/Classified information requirements of IRCC and the Government of Canada. It is noted that the [REDACTED] The criteria of Module 5 [REDACTED] have a similar look and feel.

Risk Assessment: Unlikely/High

Recommendation: It is recommended that IN interface with the IRCC DSO and determine the appropriate information security designation for the Module 5 [REDACTED] (the criteria, justification, and the Officer Instruction).

5.8 Openness

No risks were identified regarding this principle.

5.9 Individual Access

Risk #11: There is a risk that Chinook information will not be released to an individual/requester due to the Module 3 disclaimer, which has not been reviewed and approved by IRCC ATIP.

Risk Assessment: Unlikely/Medium

Recommendation: It is recommended that the following portion of the Module 3 disclaimer is reviewed and approved by ATIP:

[REDACTED]

5.10 Compliance

No risks were identified regarding this principle.

6. MANAGEMENT RISK MITIGATION ACTION PLAN

An Action Plan supporting the mitigation of risks identified in this PRA will be created and managed outside of this deliverable.

7. SUPPLEMENTARY DOCUMENTS LIST

1. Chinook Processing Suite One Pager (November 16, 2018)
2. Innovation Incubator Proposal; Version 3
3. Chinook Module 1 SOPs
4. Chinook Decision Maker User Manual
5. Guidelines: Chinook Module 5 – Creation of
6. Risk Tool
- 7.
8. Module 5 Submission Template
- 9.
10. Common Risk Impact Scale (CRIS)
11. Common Risk Probability Scale (CRPS)
12. 15 Minute Risk Assessment